



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604

EPA Region 5 Records Ctr.



314014

REPLY TO THE ATTENTION OF: SR-6J

VIA ELECTRONIC MAIL AND USPS

October 11, 2007

Jennifer Hale  
Environment Health & Safety, WTC 2G2  
P.O. Box 9777  
Federal Way, WA 98063-9777

RE: Plainwell Mill, Operable Unit #7, Allied Paper/Portage Creek/Kalamazoo River Site  
Comments: *Risk Analysis* for the Plainwell Mill Banks Emergency Action

Dear Ms. Hale:

RMT, Inc. provided a copy of the *Risk Analysis* (RA) for the Plainwell Mill Banks Emergency Action on behalf of Weyerhaeuser to the United States Environmental Protection Agency Region 5 (U.S. EPA). Our comments are as follows:

1. Emergency Route - Page 4 - It is not clear if the Borgess Pipp Hospital is prepared to handle a hazardous material accident victim.
2. Hazard Evaluation – Page 9 - The OSHA PEL value for Aroclor 1254 is TWA 0.5 mg/m<sup>3</sup> [skin]. It is recommended that the value in the table (1 mg/m<sup>3</sup>) be confirmed and the correct references be provided
3. Hazards/Tasks - Page 19 - In the section specifying applicable regulations "Excavations and Trenching" is not checked. Other portions of the RA indicate that there will be excavations.
4. Applicable Safety Standards or Regulations – Page 19 - "Respiratory Protection" is not checked. Other portions of the RA indicate that level C will be required when dust levels are greater than 15 mg/m<sup>3</sup> above the background reading taken prior to work commencing.
5. Protection Level Change Criteria - Page 24 - The text states that "Change to level C when dust levels are greater than 15 mg/m<sup>3</sup> above the background reading taken prior to work commencing." It is recommended that this value be confirmed and the correct references be provided.
6. Air Monitoring – Page 26 - A footnote in the Air monitoring section says "...a detailed Air-Monitoring Plan should be developed and attached..." No such plan was available for review.

7. Air Monitoring – Page 26 - The last column in the Mini-RAM portion of the air monitoring section contains information regarding upgrade of PPE based on readings. This is consistent with information provided elsewhere in the RA, but the “check-box” in the column is not checked.
8. Air Monitoring – Page 26 - No information is provided regarding maintenance and calibration procedures for the Mini-RAM.
9. Decontamination Procedures – Page 28 - It is not clear how the water, which will be used for equipment decontamination, will be collected and disposed of.
10. Emergency Response - An *Emergency Response Plan* as required by 1910.120(l) is not included in the RA. Some information regarding severe weather emergencies is provided in the PPE section (p. 24).
11. Emergency Response - A map to the nearest hospital is not provided in the RA. Although not expressly required by OSHA, most Health and Safety Plans (HASP) include a map.
12. Emergency Response - The RA does not specify where the hospital route map will be posted. It is recommended that the location/ posting area of the hospital map be specified in the RA.

Thank you for your attention to this matter. Please do not hesitate to call me at 312.886.1434, should you have any questions related to the task.

Sincerely,



Sam Chummar, Remedial Project Manager  
U.S. EPA Region 5  
Superfund Division – Remedial Response Branch #1  
77 W Jackson Blvd. (SR-6J)  
Chicago, IL 60604

cc: Eileen Furey, C-14J  
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